



PA State Grant and Special Programs
Phone: 1-800-443-0646 Fax: 717-720-3786
1200 North Seventh Street, Harrisburg, PA 17102-1444

Memo

To: Participating Schools
From: Elizabeth K. McCloud *Elizabeth K McCloud*
Vice President,
PA State Grant and Special Programs
Date: September 2020
Subject: PA State Grant Program – COVID-19 Guidance for the 2020-21 Academic Year

This memo specifically addresses adjustments to program requirements of the PA State Grant Program.

Throughout 2020, the Pennsylvania Higher Education Assistance Agency (PHEAA) has continuously been reviewing the impact of COVID-19 on students as it relates to the PA State Grant Program. Recognizing that the primary concern of schools is to protect the health and safety of students, PHEAA has been in communication with many postsecondary schools as they have made operational changes for the 2020-21 Academic Year. As the Fall 2020 term unfolds, PHEAA understands that many institutions have found it necessary to adjust the delivery model of coursework to allow students the flexibility needed to continue their studies.

On September 17, 2020, the PHEAA Board of Directors again exercised its authority as administrator and servicer of the PA State Grant Program to provide relief to impacted students as they pursue their postsecondary education while the Governor's disaster declaration remains in effect. While this relief differs from what was provided in the Winter, Spring and Summer 2020 terms, PHEAA's goal continues to be to review policies and take appropriate actions that minimize disruption for Pennsylvania's student population by easing financial burdens and maintaining access to higher education, within the bounds of statutory authority.

Please review the following guidance related to PA State Grant Program requirements and note that this *only* applies to the 2020-21 Academic Year, including fall, winter, and spring terms as applicable within each institution's academic calendar:

Non-Headquartered and Domiciled (Non-HQD) Institutions:

Students reported as "DE Program of Study" will continue to be ineligible for a PA State Grant award (Reject G). Please continue to report the actual enrollment mode for each of your students. This applies even if a student is being reported as an enrollment mode 3 or 4 only as a result of the school's changes to course delivery due to COVID-19. **Effective immediately for the 2020-21 Academic Year terms, students reported as enrollment mode 3 or 4, will not receive an Americans with Disabilities Act (ADA) notification letter, but will instead remain eligible for their PA State Grant award.** Previously cancelled awards will be reinstated. Students who received a letter within the past 30 days need not respond. Updates to our website and student portal are expected to be in place soon.

Headquartered and Domiciled (HQD) Institutions:

Please continue to report the actual enrollment mode for each of your students. This applies even if a student is being reported as an enrollment mode 3 or 4 only as a result of the school's changes to course delivery due to COVID-19.

All Institutions:

The following guidance will assist you in determining each student's appropriate enrollment mode for the fall, winter, and spring terms of the 2020-21 Academic Year. The below items highlight guidance contained in the PA State Grant Handbook. Enrollment mode must match the student's final enrollment used for eligibility determination, including ALL credits or clock hours which count toward establishing a student's enrollment

status. Please review Chapter 1, Section C and Chapter 2, Section B of the PA State Grant Handbook for additional information on the approved program of study and enrollment mode reporting requirements.

- Any course that is being delivered more than 50% online as part of an approved program of study (in Chapter 1, Section C) must be counted as online when determining a student's enrollment mode, even if the course is not coded as online through the registrar's office, but it is held online due to COVID-19.
- A hybrid program of study, as noted in Chapter 1, Section C, paragraph 3.b.ii of the *PA State Grant Handbook*, is structured to be a composite of online and classroom instruction. Eligible hybrid programs are limited to no more than 50 percent of the coursework being offered online. If greater than 50 percent of the program is offered online, then PHEAA categorizes this as an online program.
- Synchronous learning, where face-to-face instruction is achieved through real-time, two-way audio-visual technology, is considered in-classroom instruction for PA State Grant purposes (Chapter 2, Section B, paragraph 2.b.). The definition of synchronous learning is found in Chapter 2, Section B, paragraph 2.a.iii.
- A course may be held simultaneously online and in-classroom with course material offered in both traditional and online formats. If the teaching faculty member and the students achieve face-to-face instruction in real time, then the course meets the PA State Grant definition of synchronous learning. Synchronous learning may be from home using webcam equipment or applications such as Zoom and is considered in-classroom for purposes of enrollment mode reporting. If the course is partially real time, then the percentage of real-time delivery must be 50 percent or greater to maintain in-classroom status. Any course that exceeds 50 percent of instruction delivered in an asynchronous manner must be considered online for PA State Grant purposes. Determination of the synchronicity of courses (please refer to Chapter 2, Section B, paragraph 2.b) is necessary in calculating the enrollment mode percentage.
- When, due to COVID-19 disruptions, the school has no way to know the specific methods employed by each class instructor for courses that are typically offered in-classroom, then this falls into a situation where the instruction method (in this case the synchronicity) is unknown. In these cases, PHEAA directs schools to categorize the classes as online. As noted in Chapter 2, Section B.2.a.ii, when there is no clear way to verify that a hybrid course is in compliance with the 50 percent classroom instruction requirement, then the course must be considered online.
- If your school is offering hybrid courses (Chapter 2, Section B.2.a.ii) and online instruction exceeds 50 percent of the combined online and in-classroom contact hours, then you must consider the hybrid course as online for purposes of determining an enrollment mode percentage. Conversely, if the online instruction is less than 50 percent of the combined online and in-classroom contact hours, then the hybrid course is considered in-classroom for purposes of enrollment mode reporting. When there is no clear way to verify that a hybrid course is in compliance with the 50 percent classroom instruction requirement, then the course is considered online.
- If a student is enrolled via consortium or contractual agreement with another school and the other school does not have the mode of delivery listed in the course catalog, you should contact the school to determine how the courses are delivered. If you have attempted but are unable to get this information from the other school, you must assume the courses are 100% online. Your contact with the other institution should be documented in the student's file (for example emails, written correspondence, etc.)
- If a student's enrollment mode requires updating due to a change such as dropping courses or adding courses in a module that begins later in the term, the school must follow the existing guidance to update the enrollment mode. If, however, the school makes a wholesale flip at some point in the term, as a result of COVID-19, from at least some in-classroom course delivery to fully online instruction, the school will not be required to revise the reported enrollment mode for students.

Additional Policy Reminders:

- If a student withdraws from school as a result of COVID-19 or is taking an approved leave of absence due to a coronavirus-related reason (e.g., the student's child is home due to K-12 closure, the student contracted coronavirus, etc.), you must follow the withdrawal procedures outlined in Chapter 3, Section C of the PA State Grant Program Handbook to determine eligibility. Please note that this may impact the student's ability to satisfy Academic Progress and the student may require an exception in the future.
- Please note that minimum term length requirements continue to apply for the 2020-21 Academic Year. If your institution adjusts a term start date for the 2021 Winter or Spring term, please notify PHEAA staff via email at sghelp@phea.org as this may result in an adjusted disbursement date for that term.
- As a reminder, cost adjustments must be submitted for any students whose tuition and fee charges represent more than a 25% reduction to the PHEAA-approved tuition and fees. Reductions to room and board do not require any adjustment in costs.

Please remember that all schools must adhere to regulatory agency, accreditation, licensing board, Title IV, and privacy requirements, as these provisions do not override such requirements, nor does PHEAA have the authority to waive such requirements. PHEAA understands that school administrators may be working remotely and continues an expectation that student data will be appropriately safeguarded during this time. PHEAA will make reasonable accommodations for exceptions to the ability of a school to comply with roster return and reconciliation deadlines during this extraordinary time.

This memo does not otherwise supersede guidance contained in the PA State Grant Handbook and should be applied in conjunction with current program policy. We recognize and continue to expect your good faith efforts to comply with the intent of the above guidance as you administer the PA State Grant Program.

If there are any additional changes in policy for the PA State Grant and other Special Programs as it relates to the COVID-19 situation, PHEAA will communicate this directly to institutions. If you have questions which have not been addressed by this guidance, please send them to sghelp@phea.org or to the applicable special program mailbox.

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